

REMARKS

In response to the above-identified Office Action, Applicant seeks to amend the application and seeks reconsideration thereof. In this response, Applicant amends claims 1-3, 5-7, 9, 11, 12 and 15. Applicant cancels claim 10. Applicant does not add any new claims. Accordingly, claims 1-9, 11-13 and 15 are pending.

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attachment is captioned "Version With Markings To Show Changes Made."

I. Claims Rejected Under 35 U.S.C. § 102

Claims 1, 5 and 15 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,619,706 issued to Young (hereinafter "Young").

In regard to claims 1, 5 and 15, the Examiner states in Paper No. 6, Section 2 that Young teaches the transferring of initializing data for peripheral devices and components in interrupts by interrupt controllers and rerouting these interrupts containing initializing data to another interrupt controller. However, the claims as amended clarify that the initializing data being sent and rerouted is initializing data for an interrupt controller. The Examiner has not indicated and Applicant has been unable to discern any part of Young that teaches rerouting interrupt controller initialization data. Therefore, Young does not teach each of the elements of claims 1, 5 and 15. Accordingly, reconsideration and withdrawal of the anticipation rejection of these claims are requested.

II. Claims Rejected Under 35 U.S.C. § 103

Claims 2-4 and 6-14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Young in view of U.S. Patent No. 5,987,538 issued to Tavallaee, et al. (hereinafter "Tavallaee").

In regard to claims 2-4 and 6-8, these claims depend from independent claims 1 and 5 and incorporate the limitations thereof. Thus, for the reasons mentioned in regard to claims 1 and 5, Young does not teach each of the elements of these claims. Further, Tavallaei does not cure the defects of Young. The Examiner has not indicated and Applicant has been unable to discern any part of Tavallaei that teaches or suggests the rerouting of interrupt controller initialization data. Therefore, Young, in view of Tavallaei does not teach or suggest each of the elements of claims 2-4 and 6-8.

Further, the Examiner engages in a hindsight driven piece meal reconstruction of the claimed invention in regard to the elements of claims 2-4 and 6-8. The Examiner states that it would have been obvious to one having ordinary skill in the art at the time of the invention "to modify Young's invention to include such programmable data entries in the interrupt requests transferred to the interrupt controllers in order to include initializing data in the fields of the entry such as configuration instruction, for the controllers and for the generation of SMIs." Applicant has been unable to discern what the Examiner believes this combination of Young and Tavallaei teaches. It does not make sense to Applicant to state that programmable data entries which are fields in a redirection table can be included in an interrupt request transferred to an interrupt controller. See Tavallaei, col. 7, lines 52-62 for further description of the programmable data entries.

Also, the Examiner failed to establish that either Young or Tavallaei teach or suggest the desirability of the proposed combination of elements. See MPEP § 2143.01. Both Young and Tavallaei teach complete interrupt handling schemes neither of which require the redirection of initialization data for the interrupt controllers in their respective systems. Thus, the Examiner has failed to provide any motivation for the proposed combination of Tavallaei and Young. Therefore, Tavallaei cannot be combined with Young to teach or suggest each of the elements of the claims 2-4 and 6-8. Accordingly, reconsideration and withdrawal of the obviousness rejection of claims 2-4 and 6-9 are requested.

In regard to claim 9, this claim as amended includes many of the same elements as claims 1 and 5 including the redirection of interrupt controller initialization data. For the reasons mentioned in regard to claims 1 and 5 and further in regard to the dependent claims 2-4 and 6-8, the elements of claim 9 are not taught or suggested by Young in view of Tavallaei. Accordingly, reconsideration and withdrawal of the obviousness rejection of claim 9 are requested.

In regard to claims 11 and 12, these claims depend from independent claim 9 and incorporate the limitations thereof. Thus, at least for the reasons mentioned in regard to claim 9, these claims are not obvious over Young in view of Tavallaei. Accordingly, reconsideration and withdrawal of the obviousness rejection of claims 11 and 12 are requested.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely claims 1-9, 11, 12 and 15 patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207 3800.

Respectfully submitted,

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Dated: 4/24, 2003



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CERTIFICATE OF TRANSMISSION:

I hereby certify that this paper is being facsimile transmitted to the U.S. Patent and Trademark Office on April 24, 2003.



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4-24-03
April 24, 2003